



DOCKET FILE COPY ORIGINAL  
Before the  
**Federal Communication Commission**  
**Washington, D.C. 20554**

In the Matter of )  
Amendment of Part 97 of the Commission's Rules ) WT Docket No. RM-11306  
Regulation by bandwidth within Amateur Radio )  
Service )

**Notice of Proposed Rule Making and Order**

**Subject: "Regulation by Bandwidth"**

First of all, I am NOT in favor of this rule making, as a result of ARRL's petition for Rule Making to regulate the Amateur Bands by necessary bandwidth rather than by mode.

And herein, are my rationales as to why.

I am AGAINST this Rule Making RM-11306 and RM-11305 for these reasons as it will diminish a hobby of continuous technology upon which that this country was built by Amateurs Radio operators.

"If it ain't broke, why fix it?"

If another Hurricanes like Katrina and Rita hit our coasts, the have Amateur Radio operators pitched in, free of charge, to provide emergency communications to those southern states. Would you like the incompatibilities of a mix of Analog and Digital mode collide.

I don't think so.

Just like good fences make good neighbors, definitive bands and modes allocations make good communications for Amateur Radio.

The idea of gentleman's agreement, which is an oxymoron, for signal-bandwidth boundaries will be unacceptable at best. This Rule Making, RM-11306 and RM-11305 are both flawed as they will create chaos on the Amateur bands due to Analog vs. digital both together will yield incompatible modes.

Why not re-farm the old Novice bands for digital, i.e. 7.050 MHz and below for 40 meter digital, avoiding FCC's "Insular Areas/islands" sub-band of 7.075 to 7.100 MHz, already interfered by "rude" digital operators who disregard the any Gentlemen's agreement.

No. of Copies rec'd 0  
List ABCDE

Therefore, history will repeat this mistake!

I object, strenuously, to both Rule Making 11305 and RM-113066 from both an Amateur licensee and a Commercial licensee. If passed it will be just like the “autobahn” in Europe, where speeds, modes and frequencies will be incompatible. Therefore, phone modes and digital signals will expand to occupy entire bands.

Both Rule Makings RM-11305 and RM-11306 has forgot to solicit inputs from the domestic Amateur Radio community before making such “hair brain” petitions. And what about international countries operating their radio what chaos will these rule makings impinging on the Post and Telegraph departments?

I am amazed at the arrogance of the ARRL and the “Think Tank” petitioners in not consulting with the rest of the Amateur Radio world. Has any of these petitioners checked with other countries and IARU members for their inputs prior to making petitions?

ARRL does not represent everyone in the Amateur Radio community

These mixed incompatible modes, analog and digital, will NOT work unless band plans are enforced by the FCC. Is this something the FCC wants to put in their budget? Is this an enforcement the FCC wishes to undertake? I don’t believe so.

Is the FCC willing to enforce these rule makings with a clear set of rules and regulations?

Again, I don’t think so.

The ARRL proposal is BAD for Amateur Radio and its membership. I believe the ARRL was made aware of these shortcomings and the League refused to correct them!

If chaos and anarchy on the bands is what is wanted then these rule makings are the answer.

Just because a digital signal comes out of a computer clean it is mode compatible with other narrow modes. As a CW (Continuous Wave) operator am I to tell a close by digital operator, who can’t, won’t or is unable to copy code, near me how am I going to him/her/them I am using the frequency and would they kindly move? I don’t think so!

I think that these petitioners just to set a new standard...for NOT thinking!

I believe the Canadians have adopted a band plan which already deals with this incompatibility of modes. Check, [http:// www.rac.ca/service/allband.htm](http://www.rac.ca/service/allband.htm) for their chart of which the Canadian government encourages visitors to their country to comply to these sub-bands and modes. Oh Canada!

3.

Additionally, it will very difficult for the Commission to administer this ruling, if passed.

I request the Commission do an about face if one values our way of life in Amateur Radio and defeat both RM-11305 and RM-11306 as poorly proposed petitions for new regulations without staffing their data, or lack thereof, with both domestic and international Amateurs.

These petitions would be like repealing laws concerning bank robbery and expecting everyone to abide by a "gentlemen's agreement" to abstain from robbing banks.

Again, I don't think so!

Just listen on any Amateur band to see just how many "GENTLEMEN" one can hear! I just with any technical experience would even consider such a proposal to the Commission changing Part 97 of the FCC Rules and Regulations.

Again, these proposals, RM-11305 and RM-11306 are both flawed. One cannot mix Analog and Digital signals on the same frequencies. Band plans by modes make the best sense.

"Again, if it ain't broke, why fix it?"

I wish to thank the Commission for your time and considering my additional comments.

Respectfully submitted (23 January 2006), on behave of the concerned members of the Pacific Radio Amateur Transmitting Society (PAC R.A.T.S.) and ARRL Affiliated Special Services Club

cc: Club Files  
bcc: Club's Atty.  
Other

ALOHA and MAHALO,

A handwritten signature in black ink, appearing to read "Lee" followed by a stylized flourish.

L. R. Wical, President  
Pacific R.A.T.S. Club